

September 22, 2017

# **REMEDIAL INVESTIGATION / FEASIBILITY STUDY**

## **Progress Report #14 – August 2017**

*Prepared for*

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## APPENDIX

### A. Project Schedule

## **1.0 INTRODUCTION**

This Progress Report (Report) presents a summary of activities completed during the period of August 2017, on behalf of Columbia Falls Aluminum Company, LLC (CFAC), for the Remedial Investigation / Feasibility Study (RI/FS) being performed at the Anaconda Aluminum Co. Columbia Falls Reduction Plant (a/k/a Columbia Falls Aluminum Plant) generally located near Columbia Falls in Flathead County, Montana (“Site”). The RI/FS is being conducted pursuant to the Administrative Settlement Agreement and Order on Consent (AOC) dated November 30, 2015 between CFAC and the United States Environmental Protection Agency (USEPA) (CERCLA Docket No. 08-2016-0002).

This Report provides a description of the actions that have been taken to comply with the AOC during the reporting period and describes work planned for the upcoming reporting period, including an updated project schedule as Appendix A. This report also provides updates regarding the availability of any new, validated sampling data received by CFAC during the reporting period. Lastly, this Report provides an update on any scope revisions and/or project delays encountered and solutions implemented to address any changes.

## **2.0 WORK COMPLETED**

This Section provides a summary of activities completed or ongoing in August 2017.

### **2.1 Preparation of Response to Comments on Draft Phase I Site Characterization Data Summary Report and Screening Level Ecological Risk Assessment Summary Report**

CFAC/Roux Associates received comments on the draft Phase I Site Characterization Data Summary Report (Data Summary Report) and draft Screening Level Ecological Risk Assessment (SLERA) on April 14, 2017 from USEPA and on April 17, 2017 from MDEQ. CFAC/Roux Associates submitted responses on May 26, 2017 to the comments provided by USEPA and MDEQ. The responses to comments were reviewed by USEPA and MDEQ in June 2017. Additional comments from USEPA were provided on June 13, 2017 and additional comments from MDEQ were provided on June 20, 2017. CFAC/Roux Associates reviewed the additional comments and submitted responses to the comments to USEPA/MDEQ on July 27, 2017. CFAC/Roux Associates also revised the Data Summary Report and SLERA as per the comments from both USEPA and MDEQ and a revised Data Summary Report was submitted to USEPA/MDEQ on July 27, 2017, and a revised SLERA was submitted to USEPA MDEQ on August 15, 2017. The finalization of the Data Summary Report and SLERA are pending review and approval by USEPA and MDEQ.

### **2.2 Preparation of the Groundwater and Surface Water Data Summary Report**

The Phase I Site Characterization Scope of Work described in the RI/FS Work Plan and Phase I Sampling and Analysis Plan included four rounds of surface water and groundwater sampling. The fourth and final round of sampling was completed in June 2017. Data collected from the fourth round of sampling was submitted for data validation in July 2017 and was completed in August 2017.

As discussed with USEPA/MDEQ, the results of all four rounds of sampling will be included in a data summary report. The Groundwater and Surface Water Data Summary Report (GW and SW Data Summary Report) will also include a summary of slug testing field activities and data evaluation (see Section 2.3). The GW and SW Data Summary Report is expected to be submitted to USEPA/MDEQ for review in October 2017.

### **2.3 Asbestos Landfill Surface Soil Sampling**

Surface soil sampling at the Asbestos Landfills began on July 31, 2017 and was completed on August 10, 2017. The Asbestos Landfill surface soil sampling was completed by Roux Associates, with support of Hydrometrics, in accordance with the scope of work described in the Phase I SAP Modification #10, which was submitted to USEPA on May 24, 2017 and approved via email concurrence by USEPA on June 23, 2017. Surface soil was collected from a total of 56 grids in the southeast, southwest, northeast, and northwest Asbestos Landfills. Additionally, a wire identified by Hydrometrics as potentially asbestos containing material was collected from grid CFAS-55 for analysis. All samples were shipped to the TestAmerica Asbestos EMLAB P&K in Arvada, Colorado. The data generated during the surface soil sampling was sent for validation in August 2017, and is expected to be received in September 2017. Following the receipt of the validated data, CFAC and Roux Associates will submit a summary of the sampling results and evaluation of the data to the USEPA in a letter report or technical memorandum.

### **2.4 Groundwater and Surface Water Sampling - Round Three Results Summary**

The third round of groundwater and surface water sampling was completed in early April 2017. Results of the round three sampling were compiled and provided to USEPA and MDEQ in a summary e-mail following the receipt of all validated laboratory data on August 21, 2017. As described in Section 2.2, a report summarizing the results of all four sampling events is expected to be submitted to USEPA/MDEQ for review in October 2017.

### **2.5 Investigation Derived Waste Management**

Roux Associates collected one waste characterization water sample on June 30, 2017 following the completion of the fourth groundwater sampling event. The water sample was collected in accordance with the Investigation Derived Waste (IDW) Management Plan dated May 9, 2016. Roux Associates provided the sampling results to USEPA and the Oregon Department of Environmental Quality (for notification purposes in the state where the waste will be shipped) on July 27, 2017. USEPA provided their concurrence with the sample results and plan for water disposal via e-mail on August 2, 2017. The water (approximately 3,200 gallons) was extracted from the onsite tank on August 17, 2017, transported via tanker truck, and received by Chemical Waste Management, 17629 Cedar Springs Lane, Oregon 97812 on August 18, 2017 in accordance with the IDW Management Plan. Transport of the water was managed by Cascade Drilling.

The two tanks still remain onsite for cleaning and transportation offsite during the next reporting period.

## **2.6 Concrete Sampling and Data Evaluation**

Concrete sampling of one crushed concrete stockpile was conducted by Hydrometrics on August 10, 2017, in accordance with the path forward outlined in the email correspondence from USEPA dated June 28, 2017. The concrete sample was sent to TestAmerica in Edison, New Jersey. Concrete data was sent for data validation in August 2017 and is expected to be received during the next reporting period. Results of the concrete sampling activities will be provided to the USEPA and MDEQ for review and concurrence throughout the sampling efforts, prior to using any concrete for demolition backfilling activities.

## **2.7 Weekly Reporting, Project Conference Calls, and Project Meetings**

Roux Associates submitted a weekly report to the USEPA for the first two weeks in August 2017 to document ongoing field activities described above. The weekly reports include a summary of work completed for the prior week, work upcoming for the next week, health and safety, and any additional notable items.

A project update conference call was not held during August 2017. A project update call was held during the previous reporting period on July 31, 2017 to review the August 2017 field work activities and to provide an update on the additional response to comments for the CFAC Phase I Data Summary Report and SLERA Summary Report. Additionally, topics discussed included work progress, schedule, and upcoming public meetings. The next project update call is scheduled for mid-September 2017.

### **3.0 WORK PLANNED FOR NEXT REPORTING PERIOD**

This section summarizes the work planned for the next reporting period of September 2017.

#### **3.1 Submittal of the Final Phase I DSR and SLERA Summary Report**

Pending the review and any further comments by USEPA/MDEQ on the revised Data Summary Report and SLERA, CFAC/Roux Associates will make appropriate revisions to the reports in September 2017 and submit to the USEPA and MDEQ as final.

#### **3.2 Groundwater and Surface Water Sampling Data Summary Report**

As noted in Section 2.2, CFAC/Roux Associates will continue evaluating the four rounds of data and will continue preparation of the GW & SW Data Summary Report in September 2017. The GW & SW Data Summary Report is expected to be submitted to USEPA in October 2017.

#### **3.3 Investigation Derived Waste Disposal**

As described in Section 2.5, Roux Associates, with the support of Cascade Drilling, will coordinate the cleaning and offsite transport of the two onsite tanks during the next reporting period.

#### **3.4 Asbestos Landfill Surface Soil Sampling**

As described in Section 2.3, surface soil sampling activities at the Asbestos Landfills began on July 31, 2017 and was completed on August 10, 2017. CFAC and Roux Associates will submit a summary of the sampling results and evaluation of the data to the USEPA/MDEQ in a separate letter report or technical memorandum following the receipt of validated data during the next reporting period(s).

#### **3.5 Concrete Sampling and Data Evaluation**

Sampling and laboratory analysis of concrete from the Main Plant building is planned to continue during the next reporting period(s), in accordance with the path forward outlined in the email correspondence from USEPA dated June 28, 2017. As noted in the email correspondence, concrete will be sampled after being removed from the Main Plant Building and after being crushed by Calbag (Demolition Contractor). Concrete samples will be collected at a minimum frequency of one, 30-point composite sample per 5,000 cubic yards of crushed concrete. Results

of the concrete sampling activities will be provided to the USEPA and MDEQ for review and concurrence throughout the sampling efforts, prior to using any concrete for demolition backfilling activities.



#### **4.0 DATABASE UPDATES**

Validation of laboratory data from the Phase I Site Characterization is being performed by Laboratory Data Consultants (LDC) as a subcontractor to Roux Associates. In August 2017, three validated datasets from the fourth round of groundwater and surface water sampling were received from LDC. A total of thirteen validated datasets from round four validated data is was uploaded to the CFAC RI/FS database by Roux Associates in August 2017.

Validated data will continue to be imported into the project database and managed in accordance with the data management procedures outlined in Section 7.10 of the QAPP. Future progress reports will discuss updates to the project database.

## **5.0 SCOPE/SCHEDULE REVISIONS**

An updated Phase I Site Characterization schedule is attached to this Progress Report in Appendix A. The schedule was updated to reflect progress based on RI/FS activities completed through August 2017. The project schedule was revised as per the outcomes of the discussions with USEPA and MDEQ in August 2017 and to account for response time to the additional EPA/MDEQ comments/revisions on the Phase I Data Summary Report and SLERA Summary Report. No changes to the schedule are expected at this time for the remaining Phase I Site Characterization tasks.

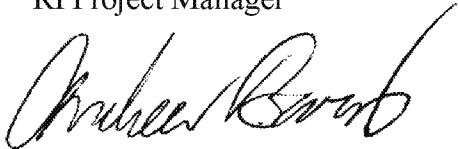
On behalf of CFAC, Roux Associates will continue to pursue the overall objectives described in the AOC and the RI/FS Work Plan. Roux Associates will continue to inform the USEPA of completed and upcoming activities pursuant to the requirements of the AOC in future progress reports.

Respectfully submitted,

ROUX ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read "Michael Ritorto".

Michael Ritorto  
Principal Hydrogeologist /  
RI Project Manager

A handwritten signature in black ink, appearing to read "Andrew Baris".

Andrew Baris  
Vice President / Principal Hydrogeologist  
RI/FS Project Manager

**APPENDIX A**

**Project Schedule**

